

THE LAW OFFICE OF THUY Q. PHAM

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**Via ECF**

November 3, 2023

Hon. Jesse M. Furman,  
United States District Judge, Southern District of New York

RE: Duviella et al. v. Mayorkas, et al., No. 1:22-cv-08015-JMF  
Letter Motion Requesting an Adjournment to Serve an Amended Complaint via ECF  
Pursuant to Individual Rules 2(A), 2(E), and 4(A)

Dear Judge Furman:

As you know, this office represents Catherine Duviella and Zulu Alhassan, the plaintiffs (“Plaintiffs”) in above-referenced action. Pursuant to Your Honor’s Individual Rules 2(E), Plaintiffs hereby request an adjournment of (1) the November 3, 2023 due date for Defendants’ Answer. (2) There have been two previous requests for an adjournment by Plaintiff and two previous requests by Defendants for an extension. (3) All previous requests for adjournments and extensions were granted by this Court.

(4) The reason for the instant requested extension is that, after conferring with opposing counsel and my clients as to the merits of this action, I seek to amend the complaint dated September 20, 2022. (5) Defendants’ Counsel does not oppose Plaintiff’s amending to the Complaint. (6) The current existing deadlines are November 3, 2023 for Defendants’ Answer and the initial pre-trial conference is scheduled for November 15, 2023. However, the parties have agreed that Plaintiff will serve the Amended Complaint via ECF on or before November 30, 2023. Plaintiff consents that Defendants may have sixty (60) days to respond, i.e., on or before January 29, 2024, given the holiday season. We respectfully request that the court reschedule the initial pre-trial conference.

Thank you in advance for your time and consideration.

Application GRANTED. The initial pretrial conference currently scheduled for November 15, 2023 is hereby RESCHEDULED to **December 6, 2023, at 9:00 a.m.** The Clerk is directed to terminate ECF No. 26. SO ORDERED.

November 6, 2023

Respectfully submitted,

/s/ Thuy Q. Pham

Thuy Q. Pham, Esq.

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